



June 30, 2022

ULNRC-06739

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

10 CFR 50.90

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
POST-AUDIT SUPPLEMENT TO LICENSE AMENDMENT REQUEST TO ADOPT  
TSTF-439 AND TSTF-505 (LDCN 20-0007)**

- References:
1. ULNRC-06688, "Request for License Amendment to Revise Technical Specifications to Adopt TSTF-505, Revision 2, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4B,' and TSTF-439, Revision 2, 'Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO' (LDCN 20-0007)," dated October 21, 2021 (ADAMS Accession Number ML21294A394)
  2. ULNRC-06702, "Supplement to License Amendment Request to Adopt TSTF-439 and TSTF-505, LDCN 20-0007," dated November 24, 2021 (ADAMS Accession Number ML21328A184)
  3. NRC letter, "Callaway Plant, Unit No. 1 – Regulatory Audit Plan and Setup of Online Reference Portal for License Amendment Request to Revise Technical Specifications to Adopt TSTF-505, Revision 2 and TSTF-439, Revision 2 (EPID L-2021-LLA-0197)," dated February 18, 2022 (ADAMS Accession No. ML22048A002)
  4. NRC Letter, "Callaway Plant, Unit No. 1 – Audit Questions for License Amendment Request to Revise Technical Specifications to Adopt TSTF-505 and TSTF-439, Revision 2 (EPID-L-2021-LLA-0197)," dated March 7, 2022 (ADAMS Accession No. ML22061A004)

In the letter identified as Reference 1, Union Electric Company (Ameren Missouri) submitted an application for amendment to Renewed Facility Operating License Number NPF-30 for the Callaway Plant. The requested amendment would revise applicable Technical Specifications to implement risk-informed Completion Times and establish the Risk-Informed Completion Time (RICT) Program in accordance with the guidance of TSTF-505, Revision 2. In support of the adoption of TSTF-505, TSTF-439, Revision 2, which involves the elimination of second Completion Times currently specified in the Technical Specifications, would also be adopted. Besides the changes needed to adopt TSTF-505 and TSTF-439, the requested amendment would also remove obsolete one-time Completion Times contained in the applicable Technical Specifications.

Following submittal of the letter identified as Reference 2 (for making corrections to the Technical Specification pages included with the LAR), the NRC completed its acceptance review of the LAR (in November 2021). In early 2022, the NRC staff indicated that an audit would be conducted for the LAR. By letter dated February 18, 2022 (Reference 3), the NRC staff provided an audit plan and requested the setup of an online reference portal for the audit. In a follow-up letter dated March 7, 2022 (Reference 4), the NRC staff provided its compiled list of audit questions/requests to be addressed in the audit, which was subsequently conducted March 22-25, 2022. This letter hereby transmits responses to those audit questions/requests requiring written, docketed responses (as determined from the audit) and thus serves as a supplement to the LAR. The responses to the NRC audit questions/requests are provided in Attachment 9 to this letter.

While developing the responses to the NRC audit questions/requests, the need for a proposed license condition was identified in regard to the plant's probabilistic risk assessment (PRA) and the next, planned PRA update. The proposed license condition is thus now part of the changes being requested per the LAR and this supplement. Details are provided in Attachments 1 and 9 to the letter. Mark-ups of the Operating License (OL) and "clean" pages reflecting incorporation of the change (if approved) are provided as Attachments 7 and 8 to this letter, respectively.

As a result of providing responses to the NRC audit questions/requests, this LAR supplement provides new/updated information from what was provided in the original (Reference 1) LAR. A number of attachments and enclosures are provided, most of which are replacements to those provided in the original LAR. Specifically, as noted in the applicable responses to some of the NRC audit questions/requests (in Attachment 9), revisions to all of the Reference 1 LAR Attachments and Enclosures 1 and 4 were identified to be needed. On that basis, updated/replacement versions of those documents are hereby provided with this LAR supplement. Specifically, replacements for original Attachments 1 through 6 are correspondingly provided as Attachments 1 through 6 to this letter. Replacements for Enclosures 1 and 4 are provided as Enclosures 1 and 4 (so as to maintain the numbering of the enclosures).

It should be noted, in particular, that responding to the NRC audit questions/requests identified the need to revise the proposed Technical Specification (TS) changes and TS Bases changes presented as Attachments 2, 3 and 4 in original LAR. Replacements for these attachments are included in the six, provided replacement attachments mentioned above (specifically as attachments 2, 3 and 4). In regard to the changes made since submittal of the original LAR, it should be noted that no revision bars are used on the replacement documents for the TS and TS Bases changes since mark-ups and revision bars are already used to reflect the proposed licensing document changes. The changes can be identified, however, by referring to the responses for the applicable NRC audit questions/requests, i.e., STSB Q-01, STSB Q-02 and STSB Q-04 in Attachment 9.

The information and changes provided via this letter do not change the "No Significant Hazards Consideration" conclusions reached in the LAR, nor do they change the conclusion reached in regard to no need for an environmental assessment based on the categorical exclusion provisions of 10 CFR 51.22.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," Section (b)(1), a copy of this supplement provided in connection with the above-referenced submittals is being provided to the designated Missouri State official.

Further, this submittal does not contain new commitments.

If there are any questions, please contact Tom Elwood at 314-225-1905.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Todd A. Witt  
Manager, Regulatory Affairs

Executed on: 06-30-2022

Attachments:

1. Replacement for Attachment 1, "Description and Assessment," of ULNRC-06688
2. Replacement for Attachment 2, "Proposed Technical Specification Changes (Mark-up)," of ULNRC-06688
3. Replacement for Attachment 3, "Revised Technical Specification Pages," of ULNRC-06688, as corrected in ULNRC-06702
4. Replacement for Attachment 4, "Proposed Changes To Technical Specification Bases Changes (Mark-Up) Pages (For Information)," of ULNRC-06688
5. Replacement for Attachment 5, "Cross-Reference of TSTF-505 and Callaway Technical Specification," of ULNRC-06688
6. Replacement for Attachment 6, "Description and Assessment Specific to TSTF-439," of ULNRC-06688
7. Proposed Operating License Changes (Mark-up)
8. Revised Operating License Pages
9. Responses to NRC Audit Questions

Enclosures:

1. Replacement for Enclosure 1, "List of Revised Required Actions to Corresponding PRA Functions," of ULNRC-06688
4. Replacement for Enclosure 4, "Information Supporting Justification of Excluding Sources of Risk Not Addressed by the PRA Models," of ULNRC-06688

cc: Mr. Scott A. Morris  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. M. Chawla  
Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O8B1A  
Washington, DC 20555-0001

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